

Part C State Annual Performance Report (APR) for FFY 2011**Overview of the Annual Performance Report Development:**

Same process as described in Indicator #1.

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8B: Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:

A Notification to LEA, if child potentially eligible for Part B;

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement:

B. Percent = [(# of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.

FFY	Measurable and Rigorous Target
2010	100%

Actual Target Data for FFY 2011:

76%

Method used to collect data and the procedures used to collect these data: Transition data were gathered through a self-report process from Early Intervention Programs (EIPs) within a period of time designated by AzEIP. Eight EIPs reported data for children, who would shortly reach the age of eligibility for Part B, with Individualized Family Service Plan (IFSP) between April 1, 2011 and June 30, 2011. Three EIPs reported data for children, who would shortly reach the age of eligibility for Part B, with IFSPs written during January 1, 2012 to March 30, 2012, which coincided with an on-site review process.

Arizona's Definition of Potentially Eligible for Part B: A child who is eligible for AzEIP and who has an IFSP when the child is two years of age or older is considered potentially eligible for Part B.

Children Exiting Part C who Received Timely Transition Planning (Notification to LEA)

a. Number of children exiting Part C and potentially eligible for Part B where the notification to the LEA occurred	160
b. Number of children exiting Part C who were potentially eligible for Part B	210
Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday (Notification to LEA) (Percent = [(a) divided by (b)] times 100)	76%

Accounting for untimely Notifications to the LEA

Seventy-six percent (160/210) children exiting Part C and potentially eligible for Part B had timely notification to the LEA

Twenty-four percent (50/210) of children exiting Part C and potentially eligible for Part B did not have timely notification to the LEA

Of the 50 Notifications that were not timely::

- In 5 instances, the service coordinators, all in one EIP, did not include appropriate documentation in the child's file to verify the notification was provided to the LEA timely.
- The remaining Notifications were late due to service coordinator delay – service coordinator did not send them within the required timeline.

In the instances where children were still in the jurisdiction of the EIP, the State verified that although late, the notifications were sent to the LEA.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2011:

The actual state target data was 76 percent. The state experienced slippage from FFY 2010 data at 84 percent and did not meet its target of 100 percent. Analysis of data by the AzEIP Service providing agencies and then by their local EIP identified:

AzEIP Service Providing Agency	Total	Total	% Compliant
Arizona State Schools for the Deaf and the Blind (1 EIPs)	4	4	100%
DES/Division of Developmental Disabilities (5 EIPs)	113	151	75%
DES/Arizona Early Intervention Program (8 EIPs)	43	55	73%
Total (14 EIPs)	160	210	76%

- Service Coordinators from one of the three AzEIP service providing agencies, totaling one EIP, demonstrated understanding and adherence (achieved 100 percent) to the requirements of ensuring the LEA Notification/Referral was sent to the school district within the required timelines.
- The second agency, including five EIPs was at 75 percent (113/151 files). Of the five EIPs, breakdown of data reveals:
- The third agency, including eight EIPs was at 78 percent (43/55). Breakdown of data by the eight EIPs indicates three of the eight were at 100 percent. Of the five remaining EIPs, the breakdown is as follows::

DES/DDD		
Files Compliant	Files Reviewed	Total Percentage
36	53	68%
54	64	84%
5	10	50%
11	14	79%
7	10	70%
113	151	75%

- The third agency, including eight EIPs was at 78 percent (43/55). Breakdown of data by the eight EIPs indicates three of the eight were at 100 percent. Of the five remaining EIPs, the breakdown is as follows:

DES/AzEIP		
Files Compliant	Files Reviewed	Total Percentage
3	5	60%
6	8	75%
7	9	78%
9	10	90%
0	5	0%
43	55	78%

- EIPs with verified self-report data less than 85 percent were required to conduct a root cause analysis, using the Local Contributing Factor Tool to identify the causes of the non-compliance, and to use the information to develop meaningful strategies to correct the noncompliance, For programs with data less than 76 percent, the state review team facilitated the root cause analysis process with EIPs selected for site-reviews. A review and analysis of the trends identified across the EIPs included:

- **Policies and Procedures**

- EIPs did not have internal procedures to ensure service coordinators consistently tracked the required timelines for the transition process for each child. As a result, the Notifications were sent after the child was two years nine months.

- **Data**

1. EIPs are not using data develop and monitor procedures to ensure timelines are met. No documentation in the child's file confirming PEA Notification was sent (service coordination contact notes, copy of PEA Notification, emails,
2. Programs are not utilizing available resources in the database to run reports to identify children who are approaching transition
3. Programs are not tracking children to ensure transition activities are completed on time
4. Of the files including documentation, data indicated the LEA Notifications were sent, but were not timely

Supervision

1. Supervisors are inconsistently completing internal reviews to monitor their program transition data and staff compliance with transition policy and timelines.
2. Supervisors are not analyzing data to identify the root cause(s) of noncompliance and implementing procedures that promote/permit ongoing monitoring to ensure compliance is achieved and maintained.

Technical Assistance /Training

The State team found trends across many of the programs regarding their actual understanding of the required timelines.

1. Many service coordinators did not understand that sending the notification the day after the child was two years and nine months is considered late. They thought they could send the notification during the month the child was two years and nine months.
2. Several service coordinators noted a family circumstance as the reason for the delay, not understanding they were required to send the notification on or before the child's age of two years and nine months, unless the parent opted-out in writing.

For some EIPs, the state required that the EIP develop internal tracking procedures to ensure the LEA Notification/Referral form was sent for each child within the required timelines, unless the parent opted-out. Supervisors were required to develop procedures for reviewing files to ensure service coordinators were sending the Notifications within the required timelines.

The AzEIP Technical Assistance Monitoring Specialist (TAMS) and the Arizona Department of Education (ADE) representative provided targeted technical assistance to schools districts and EIPs who were experiencing challenges in meeting required timelines. The purpose of the meetings were to assist the local Part C and Part B programs in building relationships and developing working procedures to ensure both programs had a shared understanding of the roles, responsibilities and timelines for notification and transition conferences for children nearing the age of three and potentially eligible for Part B.

The AzEIP TAMS provided targeted technical assistance to the EIPS through the development of corrective actions, regular status checks to monitor the EIPs progress on their corrective action plan and

provided support to EIP supervisors with developing training strategies and tools for supervisors to use to build program capacity for providing ongoing and/or as needed training to staff.

The State continued work on development of I-TEAMS, a web-based application that includes child's records. I-TEAMS will be available in the Spring of 2013. When in use, I-TEAMS will send alerts to the service coordinator when the child is nearing transition to ensure the transition conference is held within the required timelines. This feature will assist the service coordinator in tracking each child's timelines, one of the contributing factors to the identified noncompliance. Supervisors and administrators will be able to run the reports as a preventative activity in ensuring the transition conferences are held timely, another activity that is currently not occurring on a regular, consistent basis.

All findings of noncompliance were made in FFY 2011.

See combined Improvement Activity table for remaining Improvement Activities

Correction of FFY 2010 Findings of Noncompliance (if State reported less than 100 percent compliance):

Level of compliance (actual target data) State reported for FFY 2008 for this indicator: 87 percent

1. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009, through June 30, 2010)	6
2. Number of FFY 2009 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	4
3. Number of FFY 2009 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	2

Correction of FFY 2010 Findings of Noncompliance BEYOND One Year (if State reported less than 100 percent compliance):

Level of compliance (actual target data) State reported for FFY 2010 for this indicator: 87 percent

4. Number of FFY 2010 findings not timely corrected (same as the number from (3) above)	2
5. Number of FFY 2010 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	2
6. Number of FFY 2010 findings not verified as corrected [(4) minus (5)]	0

Verification of Correction of FFY 2010 noncompliance (either timely or subsequent):

Demonstrating Correction as outlined in 09-02 Memo

1. Accounting for All Instances of Noncompliance:

- The state accounted for all instances of noncompliance as identified through the three year Self-Report Cycle

2. Noncompliance Occurred in Five EIPs as Follows:

- 92% (61/66 files)

- 83% (29/35 files)
- 33% (1/3 files)
- 25% (1/4 files)
- 80% (12/15)
- 80 (4/5)

As part of the root cause analysis the state review teams conducted interviews with service coordinators and supervisors. The following contributing factors were identified:

- **Procedures**

Service Coordinators did not consistently have internal procedures for tracking the required timelines for the transition process for each child. As a result, the Notifications were sent after the child was two years nine months.

- **Technical Assistance/Training**

Although each of the EIPs had attended the seminars on the new transition policies and procedures, the State team found trends across many of the programs regarding the implementation of the revised procedures for PEA. Primarily, EIPs had an inconsistent understanding of the required timeframe for sending the PEA Notification/Referral form, or the process for having the parent opt-out in writing on the Transition Conference and Opt-Out page of the IFSP.

3. To Address the Noncompliance, the State Required the EIP to:

- Submit subsequent data to verify correction 2) conduct a root cause analysis utilizing the Contributing Factor Tool or 3) participate in a site review with the State team who facilitated a root cause analysis of the noncompliance using the Contributing Factor Tool.
- Conduct a root cause analysis, were required to develop Corrective Action Plans (CAP), including meaningful strategies that addressed the issues identified through the root cause analysis.
- Submit subsequent documentation of child's records to ensure the service coordinators were correctly implementing the requirements

4. Verification of Correction of FFY 2010 Findings of Noncompliance (either timely or subsequent):

Prong 1: To verify correction of child-specific noncompliance, the state required the EIP to send the LEA Notification to the school district, although late, as long as the child was still in the jurisdiction of the EIP. AzEIP TAMS verified correction through review of documentation.

Prong 2: To verify the program was correctly implementing the LEA notification requirement (i.e., achieved 100 percent compliance) in 34 CFR § 303.148(b)(1), the state required the EIP to either a) submit updated data, of children nearing the age of three and potentially eligible for Part B, to the state to review and verify or b) the state conducted on-site reviews to review additional child records to verify that the EIP was correctly implementing the requirements. In either instance, the state verified the program was implementing the requirements at 100 percent

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):

Statement from the Response Table	State's Response
Because the state reported less than 100 percent compliance for FFY 2010, the state must report on the status of correction of noncompliance reflected in the data the State reported for this indicator.	The state reported on the status of correction of noncompliance.
When reporting on the correction of noncompliance, the state must report, in its FFY 2011 APR, that it has verified that each EIS program with noncompliance identified in FFY 2010 for this indicator: (1) is correctly implementing 34 CFR § 303.148(b)(1) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a state data system; and (2) has provided notification to the LEA for each child, unless the child is no longer within the jurisdiction of the EIS program (i.e., the child has exited the state's Part C program due to age or other reasons), consistent with OSEP Memo 09-02. In the FFY 2011 APR, the state must describe the specific actions that were taken to verify the correction.	The state reported that it has verified that each EIS program with noncompliance identified in FFY 2010 for this indicator: (1) is correctly implementing 34 CFR § 303.148(b)(1) (i.e., achieved 100 percent compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a state data system; and (2) has provided notification to the LEA for each child, unless the child is no longer within the jurisdiction of the EIS program (i.e., the child has exited the state's Part C program due to age or other reasons), consistent with OSEP Memo 09-02. In the FFY 2011 APR, the state must describe the specific actions that were taken to verify the correction.
If the State does not report 100 percent compliance in the FFY 2010 APR, the state must review its improvement activities and revise them, if necessary to ensure compliance.	The state reviewed its improvement activities and determined revisions were not necessary.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011 (if applicable):